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Attorney for Claimants Marianas Consultancy Services, LLC and Alfred Yue

**IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN MARIANA ISLANDS**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

\$271,087.88 IN U.S. CURRENCY SEIZED
 FROM BANK OF SAIPAN ACCOUNT NO.
 ENDING IN LAST FOUR DIGITS 0157,
 HELD IN THE NAME OF "MCS"

and

\$39,188.38 IN U.S. CURRENCY SEIZED
 FROM BANK OF SAIPAN ACCOUNT NO.
 ENDING IN LAST FOUR DIGITS 2098,
 HELD IN THE NAME OF "MCS,"

Defendants.

CASE NO. 1:22-cv-00020

**STIPULATED MOTION
 TO CONTINUE DEADLINE
 FOR CLAIMANTS' RESPONSE
 TO VERIFIED COMPLAINT FOR
 FORFEITURE *IN REM***

Date:
 Time:
 Judge:

The United States and Claimants Marianas Consultancy Services, LLC and Alfred Yue, by and through their undersigned counsel, hereby STIPULATE and REQUEST that the Court find good cause and extend the Fed. R. Civ. P. G(5)(b) deadline for Claimants' response to the Government's Verified Complaint for Forfeiture *In Rem* (the "Complaint") in the above-referenced matter.

Claimants timely filed their Claims to the Defendant Property on February 7, 2023 and, pursuant to Rule G(5)(b), they have twenty-one days thereafter in which to file an Answer the Complaint.

1 Given the complex nature of the allegations of the Complaint and law and facts related
2 thereto, Claimants submit that they need additional time to review and research the same in order
3 to formulate an appropriate response to the Complaint. Moreover, counsel for Claimants is off-island
4 and unable to devote the substantial time to the response that is warranted by the Complaint.
5 Claimants submit that a one-month extension of the Rule G(5)(b) deadline is justified and
6 reasonable under the circumstances and the Government does not object.

7 Accordingly, Claimants and the Government jointly request that the Court find good cause
8 therefor and extend the Rule G(5)(b) deadline in this case to Friday, March 31, 2023.

9
10 Respectfully Stipulated and Requested this 23rd day of February, 2023.

11
12 */s/ Jessica F. Wessling*

13 JESSICA F. WESSLING
14 ERIC S. O'MALLEY
Attorneys for the United States

/s/ Mark B. Hanson

15 MARK B. HANSON
16 *Attorney for Claimants*